State of New Jersey
Department of Environmental Protection

Christine Todd Whitman
Governor

Robert C. Shinn, Jr.
Commissioner

FEB - 3 1999

Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009
Remedial Action Reports Dated June 30, 1998, July 27, 1998, October 23, 1998 and Remedial Action Schedule Dated December 11, 1998

Dear Mr. Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the above referenced Remedial Action Reports (RARs). The NJDEP's comments regarding the Remedial Action Reports are noted below:

I Soil Comments

1. Hexcel has proposed to reschedule a meeting in which Hexcel will present its comprehensive plan to remediate the site. The propose extension until February is acceptable. However, be advised, the NJDEP will no longer accept delays in the remediation of the site's contaminated soils. If the proposed plan to remediate the site is not presented to the NJDEP in February then this case will be considered out of compliance with ISRA due to the years of delays in remediating the contaminated soil on the site and appropriate compliance/enforcement actions will be taken.

II Ground Water Comments

A. Hexcel's Responses to the NJDEP's May 27, 1998 Letter

1. Hexcel's Response to Ground Water Requirement II.1. :

Hexcel indicates that a comprehensive plan for the site is being developed and that primary in the plan's scope will be the issue of how ground water is to be remediated.

a. Hexcel's statement is acknowledged.

2. Hexcel's Response to Ground Water Requirement II.2. :

Hexcel indicates that it will keep in mind the requirements outlined by the NJDEP when developing its remedial plan.

a. Hexcel's statement is acknowledged.

3. Hexcel's Response to Ground Water Requirement II.4. :

Hexcel indicates that a Saddle River sampling plan will be included in the July Progress Report.

a. *Comments on Hexcel's Saddle River sampling proposal are provided at items B4 a-d below.*

4. Hexcel's Response to Ground Water Requirement II.5. :

Hexcel indicates that a concrete basin is located beneath Building 2. Hexcel indicates that the basin has been observed in construction drawings and aerial photographs. Hexcel indicates that site personnel have reported that the basin was back-filled prior to construction of Building 2.

Hexcel indicates that based on available information, the silt layer extends beneath Building 2. *Specifically, Hexcel believes that the excavation for the basin extends into the silt layer but not* through it and that several feet of silt remain below it. Hexcel believes that a few feet of construction fill are present between the floor of the basin and the top of the remaining silt.

Hexcel believes that the floor of the basin is located at an elevation of approximately 14.5' based on the boring logs for monitoring wells MW26 and RW6-2 (The NJDEP assumes that Hexcel is referring to RW6-1 and not RW6-2). Hexcel believes that the top of silt layer in the general area of MW26, RW6-1 and RW6-2 occurs between elevations of 14' and 10' and that the bottom of the silt layer occurs between elevations of 7' and 4'. A cross-section is provided.

Hexcel concludes that the presence of dense non aqueous phase liquid (DNAPL) under Building 2, both above and below the basin floor, is sufficiently monitored by MW26, RW6-1 and RW6-2. Hexcel believes that MW26 is screened below the floor of the basin within the construction fill overlying the silt and that it is appropriately constructed to monitor for DNAPL on top of the silt. Hexcel believes that RW6-1 and RW6-2 are screened on top of the basin floor and are *appropriately constructed to monitor for DNAPL on top of the basin floor*

Hexcel concludes that DNAPL is not present in significant quantities under Building 2. Hexcel reports that DNAPL has not been observed in measurable quantities in MW26 since August 31, 1995; nor in RW6-1 since April 10, 1995; nor in RW6-2 since at least October of 1994.

Hexcel also indicates that the depression in the silt layer centered on wells MW7-4 and RW7-5 does not appear to extend toward MW26. Hexcel indicates that DNAPL has not been observed in measurable quantities in RW7-5 since October 10, 1991; nor in RW7-4 since May 10, 1994.

Hexcel indicates that the location of DNAPL is still an important consideration and will be a major factor in the design of the remedial plan.

a. Hexcel's characterization of the silt unit beneath Building 2 is plausible, but is not supported by data; borings have not been advanced under building 2 to the depth necessary to determine whether the silt layer is present. If the silt layer is not present then the vertical extent of ground water contamination under Building 2 must be considered undelineated. If the silt layer is present as described by Hexcel, and an excavation in the silt exists, then DNAPL may have accumulated within the excavation. And, if such an excavation were present, the NJDEP would not agree that MW26 was sufficient to identify all free DNAPL within the excavation. MW26 may not be located directly above the silt and regardless, is insufficient to reveal the extent of DNAPL within an excavation that is apparently the size of Building 2. Therefore, Hexcel shall submit a proposal to define the extent of the silt layer in the area of Building 2 and to either investigate the presence of free DNAPL above it or vertically delineate contamination, dissolved phase as well as product.

5. Hexcel's Response to Ground Water Requirement II.6:

Hexcel states that it will consider Napp's well locations and ground-water sampling data as well as historical ground-water sampling data from Hexcel's wells in its proposal for further ground-water sampling.

a. Hexcel's statement is acknowledged.

6. Hexcel's Response to NJDEP's Ground Water Requirement II.8. :

Hexcel indicates that it surveyed Army Corps of Engineers' well MW8 and that the results and a cross section were included in Hexcel's January 28, 1998 progress report.

a. Hexcel's response is acceptable. The NJDEP had not reviewed the January 28, 1998 progress report at the time that requirement II.8. was issued. Comments on the January 28, 1998 report were subsequently provided to Hexcel in the NJDEP's October 9, 1998 letter.

7. Hexcel's Response to Ground Water Requirement II.9. :

Hexcel indicates that MW8 was not filled with sediment during the January 14, 1997 monitoring event as previously suspected and does not need to be redeveloped. Hexcel indicates that an absorbent pad that had been placed in the well to collect DNAPL oil droplets that had been stirred up during DNAPL recovery activities had mistakenly not been removed from the well prior to the January 14, 1997 monitoring event. Hexcel indicates that the pad has since been removed "since recoverable amounts of DNAPL have not been observed in this well since November 3, 1995." Hexcel indicates that MW8 can still be used to monitor for DNAPL adjacent the Saddle River.

a. Hexcel's response is acceptable.

8. Hexcel's Response to Ground Water Requirement II.10. :

Hexcel indicates that it will continue its product monitoring and recovery program.

a. No comment is necessary.

9. Hexcel's Response to Ground Water Requirement II.12. :

Hexcel acknowledges the NJDEP's comments concerning the use of bailers. Hexcel indicates that in the future, it will specify whether a bailer is used for DNAPL measurement or recovery.

a. No comment is necessary.

10. Hexcel's Response to Ground Water Requirement II.13. :

Hexcel indicates that it will collect ground-water samples from a representative set of monitoring wells to evaluate current ground-water quality at the site. Hexcel indicates that a ground-water sampling plan will be included in the July 1998 progress report.

a. Comments on the ground-water sampling plan submitted in the July 1998 progress report are provided below.

B. July 27, 1998 RAR

1. Product Monitoring and Product Recovery

Hexcel reports having continued performance of the temporary water elevation and product monitoring, and product recovery program approved by the NJDEP in June 12, 1995 letter during the second quarter of 1998.

In April, 1998, Hexcel measured water elevations, LNAPL and DNAPL using an interface probe in wells RW1-1; RW6-1 through RW6-3; RW7-1 through RW7-10; RW15-1; P-1; CW-1, -4, -7, -8, -10, -12, -14, -16 and -17; MW1 through 31, -32B and -33; and PB-1, -2 and -4. Wells RW15-2; PI-1; and CW-2, -3, -5, -6, -9, -11, -13, -15, -18, -19, -20, -21, and -22 are not included in the monitoring program. Wells CW-3, -5, -9, -11, -15, -18 and -21 are not included specifically because they are recovery wells.

During the April event, DNAPL was detected in RW6-1; RW7-1, -4, and 5; CW-12 and –16; MW-6 and –8; and PB-2. A measurable thickness was detected only in MW-6 (0.31'.) In each of the other wells, DNAPL was known to be present only because it was observed on the interface probe.

No LNAPL was detected during the April event.

A shallow ground water flow map and a deep ground water flow map constructed using the April 1998 water elevation data are presented. Flow is similar to previous quarters.

In May of 1998, Hexcel measured water elevations, LNAPL and DNAPL using an interface probe in CW-7, -12 and -16; MW-6 and -8; RW6-1; RW 7-1, -4, and -5; PB-1 and PB-2. Hexcel inadvertently omitted RW7-5. DNAPL was detected in CW-12 and -16; MW-6 and -8; RW6-1; RW7-1 and -4; and PB-2. A measurable thickness was detected only in MW-6 (0.36'.) In each of the other wells, DNAPL was known to be present only because it was observed on the interface probe.

No LNAPL was detected during the May event.

In June of 1998, Hexcel measured water elevations, LNAPL and DNAPL using an interface probe in CW-7, -12 and -16; MW-6 and -8; RW6-1; RW7-1, -4 and -5, and PB-1 and PB-2. DNAPL was detected in CW-12 and –16; MW-6 and –8; RW6-1; RW7-1, -4, and –5; and PB-2. A measurable thickness was detected only in MW-6 (0.2'.) In each of the other wells, DNAPL was known to be present only because it was observed on the interface probe.

During the quarter, Hexcel attempted product recovery at MW-6 on approximately a weekly basis. Product recovery was not attempted at any of the other wells where DNAPL was observed during the quarter because, as Hexcel has previously reported, if the interface probe does not signal the presence of product then it is not possible to pump a significant amount of DNAPL (greater than 0.1 gallons or approximately one cup) from the well. A total of 0.6 gallons of DNAPL was recovered bringing the total amount of product recovered from the site since initiation of the temporary product recovery program in October of 1994 to 28.6 gallons.

No LNAPL recovery was attempted during the quarter. The total amount of LNAPL recovered from the site since initiation of the temporary product recovery program remains at 9.5 gallons.

Hexcel proposes to continue to perform the temporary monitoring and recovery program in accordance with the approved plan.

a. Hexcel's proposal to continue the temporary program is conditionally acceptable. Comments regarding DNAPL recovery were issued to Hexcel in the NJDEP's October 9, 1998 letter (Ground Water Comment II.1.)

2. Remedial Design Planning

Hexcel reports that as indicated in the June 30, 1998 response to the NJDEP's May 17, 1998 letter, Hexcel intends to present a comprehensive, remediation plan to the NJDEP during an October 1998 meeting, and to submit a RAW afterward. Hexcel reports that in the meantime, it is analyzing remedial alternatives in order to select an appropriate remedial strategy for the site. Hexcel indicates that ground water data will be collected and that soil will be tested, as described below, in order to further define the areas for treatment and the design of the remedial approach for the site.

a. The progress that Hexcel has actually made toward developing a remedial plan at this time is not clear. The NJDEP believes that Hexcel should be able to present at least a substantive, conceptual remedial proposal to the NJDEP at this time. However, the NJDEP does not expect Hexcel to be able to provide a finalized plan until Hexcel completes the various delineation activities that have been required in the May 27, 1998 letter, the October 9, 1998 letter and that are required below.

3. Monitoring Well Sampling

Hexcel reports that it has scheduled a ground water sampling event for the last week of July in response to the NJDEP's May 27, 1998 requirement of ground water sampling. Hexcel indicates that while the NJDEP requested a proposal, Hexcel has decided to proceed with the sampling because information on current ground water conditions at the site is essential for the remedial design currently being developed.

Hexcel intends to sample the following wells:

Deep wells: MW11, MW9, MW15, MW19, MW7, MW13, MW3, MW5, MW1

Shallow wells: MW25, MW10, MW8, MW28, MW14, MW24, MW16, MW6, MW12, MW23, MW2, MW26, MW4, MW27, MW21, MW33, MW22, MW17, MW20 and Napp well MW-E8 (contingent upon permission to access.)

Hexcel indicates that this is a representative set of wells that will be adequate for evaluation of ground water quality. Hexcel indicates that only MW-series wells will be sampled because CW-series and RW-series wells were not constructed for monitoring purposes. Hexcel notes that all shallow-deep monitoring well clusters will be included to help in comparison of shallow and deep ground water quality. Hexcel indicates that monitoring wells that will assist in delineation of ground water contamination are included, including one Napp well at the Napp site.

Samples will be analyzed for VO+10 and PCBs.

a. The results from the "at-peril" ground water sampling have been submitted with October 23, 1998 RAR . However, the review of the report has not yet been completed. At this time, without the completed review of the results, the NJDEP believes that sampling of a single Napp Technologies, Inc. well may prove to be insufficient and that sampling of ground water for parameters other than VOCs and PCBs, such as base neutral and acid extractable organic compounds (BNAs) and priority pollutant metals (PPM) will be necessary.

At this time, the only requirement that the NJDEP has is that Hexcel clarify why CW-series wells and RW-series wells cannot be sampled. The NJDEP's understanding is that wells containing

pumping equipment are not easily accessible for sample collection but that most of the CW-series and RW-series wells do not contain pumping equipment.

4. Surface Water Sampling

In response to the NJDEP's May 27, 1998 requirement to submit a proposal to sample Saddle River, Hexcel proposes to sample Saddle River in three locations adjacent to the site for VO+10 and PCBs. One sample will be collected near the up-stream property boundary, one sample will be collected adjacent MW8 and one sample will be collected at the down-stream property boundary. The location near MW8 was selected as a potential worst-case location.. All samples will be collected adjacent to the stream bank, during a low-flow period. The PCB samples will be collected by lowering the sample container directly into the surface water. The VOC samples will be collected by lowering a collection bottle directly into the surface water then transferring the contents to the sample container. The sampling will be performed upon NJDEP approval.

a. Hexcel shall sample surface water for all compounds that are known to be discharging, or could be discharging, to surface water via ground water baseflow at concentrations above State Surface Water Quality Criteria, N.J.A.C. 7:9B (SWQC), or Federal Surface Water Quality Criteria, 40 CFR Part 13, whichever is more stringent (refer to the Technical Requirements for Site Remediation at N.J.A.C. 7:26E-3.8.) According to Hexcel's July 1997 Summary of Historical Ground Water Data, various BNAs and metals have been detected in ground water above applicable surface water quality. Data on the distribution of these compounds in ground water is currently insufficient to demonstrate whether or not these compounds are discharging to surface water above SWQC. Specifically, ground water has not been sampled for BNAs and metals for a number of years. BNAs were not detected above SWQC in wells located immediately adjacent to the Saddle River but not all of the wells next to the Saddle River were sampled for BNAs. Also, while Hexcel has argued that much of the metal contamination detected in ground water was related to turbidity, the extent to which this is true has never been conclusively demonstrated. Therefore, Hexcel shall sample surface water for BNAs and priority pollutant metals in addition to VO+10 and PCBs. In order to preclude the need for such sampling, Hexcel would have to perform additional ground water sampling and demonstrate that site-related BNAs and metals are not migrating to surface water above SWQC.

b. Hexcel shall sample the surface water at seven locations rather than at three locations as shown on the attached map. The NJDEP believes that this increased number of samples adjacent to the contaminated portion of the site is appropriate and the spacing of the required locations is consistent with the sample spacing approved for the Napp Technologies, Inc. site (approximately one sample every 60'.)

c. Hexcel shall take the precautions necessary to ensure that volatile organic compounds are not lost from surface water samples during their transfer into sample containers.

d. Additional rounds of surface-water sampling may prove necessary in the future.

<u>October 23, 1998 RAR</u>

1. Be advised that the ground water section of the October 23, 1998 RAR is currently being reviewed by the NJDEP. Comments concerning this submission will be provided at a later date.

III General Requirements

1. Hexcel shall submit the results or additional work plans, in triplicate. Please note that only one copy of the Quality Assurance/Quality Control Deliverables is needed.

2. Hexcel shall submit a revised Remedial Action Schedule, pursuant to N.J.A.C. 7:26E-6.5, for NJDEP approval which includes all tasks associated with the remediation of the site within thirty (30) calendar days of the receipt of this letter.

3. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation (TRSR), N.J.A.C. 7:26E.

4. Hexcel shall collect and analyze all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual" and the TRSR, N.J.A.C. 7:26E.

5. Hexcel shall notify the assigned BEECRA Case Manager at least 14 calendar days prior to implementation of all field activities included in the Remedial Action Workplan. If Hexcel fails to initiate sampling within 30 calendar days of the receipt of this approval, any requests for an extension of the required time frames may be denied.

6. Pursuant to the TRSR, N.J.A.C. 7:26E-3.13(c)3v, all analytical data shall be presented both as a hard copy and an electronic deliverable using the database format outlined in detail in the current HAZSITE application or appropriate spreadsheet format specified in the NJDEP's electronic data interchange manual.

For further information related to electronic data submissions, please refer to the Site Remediation Program's (SRP's) home page at the following internet address: **http://www.state.nj.us/dep/srp.** The **Regulations and Guidance** page of this web site has a section dedicated to HazSite which includes downloadable files, an explanation of how to use these files to comply with the NJDEP's requirements, the SRP's Electronic Data Interchange (EDI) manual, and **Guidance for the Submission and Use of Data In GIS Compatible Formats Pursuant to "Technical Requirements for Site Remediation".**

7. Pursuant to N.J.S.A. 58:10B-3, a remediation funding source is to be established in an amount equal to or greater than the cost estimate of the implementation of the remediation and shall be in effect for a term not less than the actual time necessary to perform the remediation at the site. N.J.S.A. 58:10B-3 allows for a change of the amount in the remediation funding source as the cost estimate changes. Please provide the current estimated cost of the remaining remediation required at the site. Any increases in the estimated cost will require an increase in the amount in the Remediation Funding Source to an amount at least equal to the new estimate. Any requests to decrease the amount in the remediation funding source will be reviewed and approved by the NJDEP upon a finding that the current remediation cost estimate will be sufficient to fund all necessary remediation.

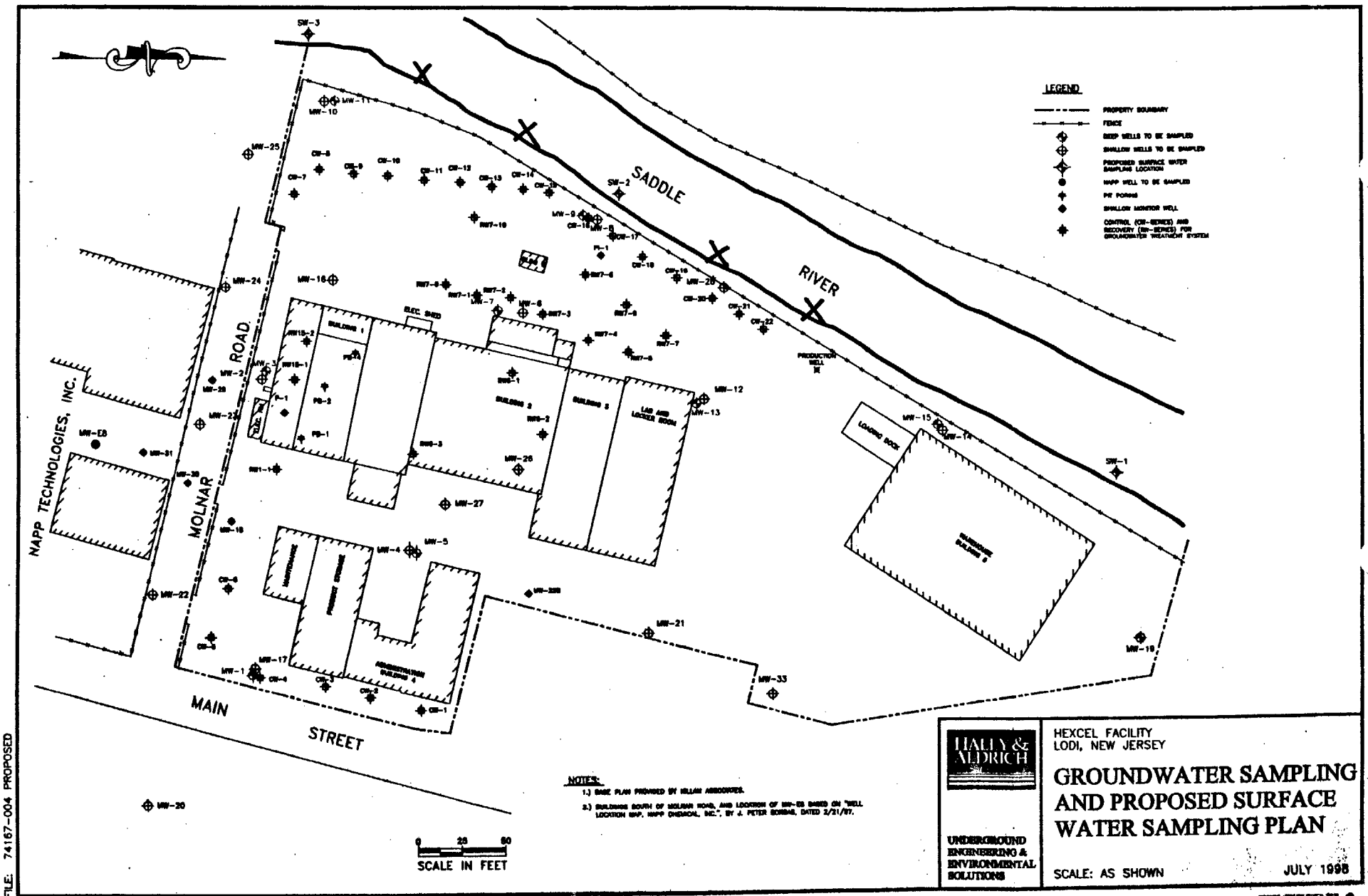
If you have any questions, please contact the Case Manager, Joseph J. Nowak , at (609) 292-0130.

Sincerely,

Michael A. Justiniano, Supervisor
Bureau of Environmental Evaluation,
Cleanup and Responsibility Assessment

c: Kris Geller, BEERA
Beverly Phillips, BGWPA
A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation
Steve Tiffinger, Bergen County Department of Health Services
Philip V. Toronto, Mayor, Borough of Lodi

X - FOUR ADDITIONAL SAMPLE LOCATIONS REQUIRED



NOTES:
1.) BASE PLAN PROVIDED BY KILLAM ASSOCIATES.
2.) BUILDINGS SOUTH OF MOLNAR ROAD, AND LOCATION OF MW-EB BASED ON "WELL LOCATION MAP, NAPP DYNAMICS, INC.", BY J. PETER BORSAI, DATED 2/21/97.

HALEY & ALDRICH
UNDERGROUND ENGINEERING & ENVIRONMENTAL SOLUTIONS

HEXCEL FACILITY
LODI, NEW JERSEY

GROUNDWATER SAMPLING AND PROPOSED SURFACE WATER SAMPLING PLAN

SCALE: AS SHOWN

JULY 1998

FIGURE 3

FILE: 74167-004 PROPOSED

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